

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HEATHER M. PALMORE, :  
: :  
Plaintiff, : Case No.: 1:23-cv-01616-ER  
: :  
v. :  
: :  
NAPOLI SHKOLNIK PLLC, PAUL NAPOLI, :  
MARIE NAPOLI, and HUNTER SHKOLNIK, :  
: :  
Defendants. :  
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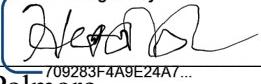
**DECLARATION OF HEATHER M. PALMORE**

I, Heather M. Palmore, Plaintiff in this action, do hereby state and declare under the penalties of perjury as follows:

1. Throughout my employment at Napoli Shkolnik PLLC's ("Napoli"), I worked from the New York City ("NYC") office on numerous occasions oftentimes more than once a week.
2. For reasons articulated in my Complaint, I was subjected to a discriminatory and retaliatory hostile work environment during my employment at Napoli. The hostile work environment permeated the entire workplace. Put another way, the hostile work environment existed whether I was in the Melville office, the NYC office, at offsite conferences with the leaders of the firm and even when I was with them in court proceedings and other matters.
3. My termination, on February 26, 2023, meant I no longer had a place to work in NYC and impacted my presence in and ability to work in NYC.
4. I learned of acts of discrimination while working at Napoli's NYC office, including but not limited to, Marie Napoli reassigning the case of a female attorney to a male attorney at the request of a client because the client believed that "men are more aggressive" and will "get the job done."
5. I was working from Napoli's NYC office when I attended the Task Force meeting where a Napoli executive exclaimed that "as a Latina woman...[she] ha[d] never experienced discrimination, so [she] [didn't] know what [I] mean[t] by discrimination" when I raised concerns about Diversity, Equity and Inclusion issues at Napoli.

6. I was working from Napoli's NYC office when I received the results from the employee survey wherein an anonymous employee complained, *inter alia*, that Napoli acquiesces to its clients' and attorneys' racist and aggressive conduct toward minority employees.
7. I was also in New York City during the sham mediation in which Napoli fraudulently begged me not to file a lawsuit in order to gain time to file a pre-emptive retaliatory lawsuit against me.
8. Many of the cases I worked on while I was employed at Napoli were litigated in NYC courts and I was often in NYC for appearances, depositions, client meetings and the like.
9. Prior to requesting medical leave on February 13, 2023, I worked over 1,250 hours at Napoli in the last calendar year.
10. The above is not a complete recitation of my work in NYC, nor is it a complete statement of the reasons my lawsuit has an impact in NYC. However, the above are representative examples.

I declare under penalty of perjury that the foregoing is true and correct.

DocuSigned by:  
  
Heather Palmore  
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08/11/2023 | 3:06 PM PDT  
Date